

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

RESPONSE TO WRITTEN COMMENTS

on Tentative Cleanup and Abatement Order
Assessor's Parcel No. 0052-160-090
Vallejo, Solano County

Water Board staff received written comments from Mr. Param Dhillon (Mr. Dhillon) on the Tentative Cleanup and Abatement Order (Tentative Order) to Param and Amandeep Dhillon (together, the Dischargers) for the unauthorized fill of wetlands at Solano County Assessor's Parcel No. 0052-160-090, Vallejo (Property). On March 25, 2021, the Tentative Order was distributed for a 30-day comment period. On April 25, 2021, Mr. Dhillon submitted comments and five attachments by email. One attachment was a map showing storm drains in the southern portion of the Property and the surrounding area. This is the same map Mr. Dhillon submitted into evidence for the Administrative Civil Liability Complaint hearing (ACL Hearing) before the Board on November 18, 2020, when a monetary penalty of \$61,374 was imposed. The other four attachments were photographs of the south side of the Property (taken on April 15, 2021, according to the file information). The documents Mr. Dhillon submitted are posted on the following website:

https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/tentative_orders.html

Mr. Dhillon's comments and attachments do not give cause to reconsider adoption of the Tentative Order. Mr. Dhillon's claims are unsupported and nothing new. They are similar to statements he has made since Water Board staff initially notified the Dischargers of violations on November 18, 2019.

Water Board staff revised the Tentative Order to include a minor change to findings 6 and 18, as shown below, but made no substantive changes:

Finding 6: The Dischargers capped the end of a storm drain ~~outlet~~ with concrete on the southwest corner of the Property without authorization. This action likely altered the hydrology of the East Lagoon by preventing the flow of stormwater and potentially tidal waters from entering and/or exiting the Property. This unauthorized activity at the Property is also in violation of the Basin Plan.

Finding 18: The Regional Water Board notified the Dischargers and interested persons of its intent to consider adoption of this ~~Cease and Desist~~ Cleanup and Abatement Order and provided an opportunity to submit written comments.

Summary of Mr. Dhillon's Comments and Staff Responses

1. **Comment:** Mr. Dhillon should not be held liable since he had no intention of breaking any rules or regulations. He was misled by the San Francisco Bay Conservation and Development Commission (BCDC) and the City of Vallejo (City).

Staff Response: *BCDC's and the City's jurisdictions differ from Water Board's jurisdiction. Shortly after Mr. Dhillon purchased the Property, and four months before the unauthorized filling and grading started, BCDC staff advised Mr. Dhillon via e-mail (Exhibit 1) that the Water Board "may have jurisdiction" over the Property and he "may want to contact" the Water Board prior to developing the Property. Mr. Dhillon did not heed this suggestion. Mr. Dhillon's intentions have no bearing on whether a cleanup and abatement order is warranted.*

2. **Comment:** The order will cost Mr. Dhillon \$200,000; it will force him to go bankrupt.

Staff Response: *Mr. Dhillon did not provide evidence supporting this cost estimate. Nevertheless, as part of an ability-to-pay analysis for the ACL Hearing, Water Board staff provided evidence documenting that, as of 2020, the Dischargers own 23 properties with a total assessed value of over \$3.4 million, with mortgages of approximately \$2.7 million. During the ACL Hearing, Mr. Dhillon testified that the number of properties was correct, and he also stated that some of the properties generate rental income.*

3. **Comment:** The Water Board does not have authority since the water on the Property is not a water of the State or United States. To support this statement, Mr. Dhillon cited the Sacramento County Superior Court judgment in San Joaquin Tributaries Authority v. California State Water Resources Control Board (SJTA Decision).

Staff Response: *Finding 14 of the Tentative Order explains the Water Board's authority under Water Code section 13304. The East Lagoon of the White Slough is located on the Property and is protected as wetland habitat in accordance with the White Slough Protection and Development Act, the White Slough Specific Area Plan, and the City's rezoning of the Property from retail use to resource conservation. On November 18, 2020, the Water Board issued Order No. R2-2020-0030, imposing administrative civil liability on the Dischargers. The order acknowledged that the Dischargers conducted construction activities on the Property and placed fill into wetlands or in areas that threatened waters of the State and United States.*

Regarding the SJTA Decision, as a preliminary matter, trial court decisions do not hold precedential value. Santa Ana Hosp. Med. Ctr. v. Belshe, 56 Cal.App.4th 819, 831 (1997) ("a written trial court ruling has no precedential value"). Moreover, even if the SJTA Decision did have precedential value, it would not deprive the Water Board of jurisdiction in this matter. The brief summary of the SJTA Decision quoted by Mr. Dhillon states, "the State Water Resources Control Board (State Board) is not authorized to adopt a state-level water quality control plan for waters that are not classified as waters of the United States. As a result, the State Board is prohibited from applying the Water Quality Control Plan for Inland Surface Waters and Enclosed Bays and Estuaries of California (Inland Surface Waters WQCP) to wetlands that do not meet the federal definition of waters of the United States." However, the Tentative Order does not implement the Inland Surface Waters WQCP, so the SJTA Decision is irrelevant.

4. **Comment:** Mr. Dhillon placed clean dirt on the Property; it is not “waste.” He questioned how it could affect the quality of waters of the State.

Staff Response: *The fill placed on the Property constitutes waste that is properly the subject of the Tentative Order. Mr. Dhillon’s assertion that the fill is “clean dirt” is unsupported. First, the source of the fill is unknown. Mr. Dhillon testified during the ACL Hearing that the fill came from someone he met at a local hardware store and that he told that person not to bring in any concrete or other debris. When Water Board staff inspected the Property on November 12, 2019, staff noted that the imported fill material included concrete rubble and other debris.¹ No testing data were provided to support the claim that the dirt was free of human pollutants (e.g., semi-volatile organic compounds, petroleum hydrocarbons, metals) or naturally occurring pollutants (e.g., arsenic). Moreover, visual observation of the dirt piles indicated that the dirt contained materials from human activities, and many pollutants that may degrade water quality and beneficial uses are invisible and require testing to detect.*

In addition, the dirt itself qualifies as a pollutant under the definition of “waste” in Water Code section 13050, subdivision (d): “Waste’ includes sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation, including waste placed within containers of whatever nature prior to, and for purposes of, disposal.” The First District Court of Appeal recently addressed this issue and explicitly found that there need not be a “claim that the fill material was contaminated or harmful in a general sense” to conclude that it is waste and properly the subject of a cleanup and abatement order. Sweeney v. California Reg'l Water Quality Control Bd., San Francisco Bay Region, 61 Cal.App.5th 1093, 275 Cal.Rptr.3d 442, 462 (2021), as modified on denial of reh'g (Mar. 18, 2021), review filed (Mar. 29, 2021) (dirt from island used to repair levees around island).

5. **Comment:** Since there is no connection to the White Slough, the East Lagoon does not exist and therefore the White Slough Protection and Development Act does not apply. The water on the Property is largely (80%) due to illegal discharges of contaminated stormwater runoff through a storm drain.

Staff Response: *Regarding the connection between the East Lagoon and the rest of White Slough, subsurface connectivity or flow through culverts below Highway 29 has not been confirmed because the Dischargers have denied Water Board staff access to the Property. The White Slough Specific Area Plan indicates the presence of two culverts, but they may now be buried under vegetation or sediment. Nevertheless, the White Slough Protection and Development Act is not limited to tidally connected waters. Section 66677(b) of the Act declared the need for “The permanent protection by local agencies of tidal wetlands and tidally influenced areas*

¹ The November 12, 2019, inspection was documented in the November 18, 2019, Inspection Report attached to the November 18, 2019, “Notice of Violation for Placement of Fill in Waters of the State, Dhillon Property, Solano County”.

of White Slough, adjacent wetlands, and upland habitat areas. [Emphasis added] (also see response to Comment 3).

Regarding the allegation that the discharges from adjacent properties are illegal, Water Board staff inquired with Vallejo Flood and Wastewater District staff as to whether stormwater flow from adjacent properties was unlawful. On October 23, 2020, District staff responded by email (Exhibit 2), stating "Based on the fact that the parcel in question is part of White Slough it would have been appropriate to route stormwater flow from neighboring parcels onto it." District staff also stated, "After conferring with Robert Newman at City of Vallejo, District and City staff are not aware of any regulations that would be used to change the status of existing private stormwater infrastructure that was in place since the 1980s."

6. **Comment:** Stopping the Dischargers from closing the storm drain is a violation of their property rights.

Staff Response: *Mr. Dhillon confuses property rights with a property owner's responsibility to seek permits for specific actions. The Water Board is charged with protecting water quality and beneficial uses and enforcing specific laws and regulations. The Dischargers placed fill in waters of the State (see Figures 1 and 2 of the Tentative Order) and blocked hydraulic connectivity that had the potential to harm wetland habitat and waters of the State. Documents that support the Water Board's authority to protect wetlands and waters of the State at the Dischargers' property include the following:*

- *White Slough Protection and Development Act, California State Legislation Assembly Bill 719, Title 7.2. San Francisco Bay Conservation and Development Commission [66600 - 66694], Chapter 6. White Slough Protection and Development [66670 - 66682]: Section 66677(d) declares the need for "Assurance that state interests in the area of White Slough [which includes the East Lagoon] including water quality, waterflow, habitat protection and enhancement, public access, transportation, and flood protection, will be protected" [emphasis added]. Section 66678(g) defines "White Slough" in part as "...all lands surrounding the historic bed of White Slough that have been touched by tidal waters since January 1, 1977...." https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=&title=7.2.&part=&chapter=6.&article=*
- *White Slough Specific Area Plan (last amended December 14, 2010): Section 2.4 (Page 5) states, "The projects described in this Plan are consistent with the requirements of AB 719," and "...approximately 144 acres of wetland habitat will be permanently protected in South White Slough. This includes 136 acres of tidal in the North and South Lagoons, five acres of brackish and mixed in East Lagoon, and three acres of seasonal freshwater in Austin Creek" [Emphasis added]. <https://cityofvallejo.net/common/pages/DisplayFile.aspx?itemId=30920>*

- *San Francisco Bay Basin (Region 2) Water Quality Control Plan (Basin Plan) November 5, 2019: Chapter 4 (Implementation Plans), Section 4.23 (Wetland Protection and Management), states, "To protect the beneficial uses and water quality of wetlands from impacts due to hydrologic modifications, the Water Board will carefully review proposed water diversions and transfers (including groundwater pumping proposals) and require or recommend control measures and/or mitigation as necessary and applicable."*
https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/bp_ch4c.html#4.23
- *Memorandum, Potential for Jurisdictional Wetlands or Waters and Options for Next Steps, Dhillon Property, Solano County APN 0052-16-09, Vallejo, California (Stuart Siegel, August 4, 2020) – Section 2.2 (Page 5-6 and Figure 3): This memorandum, drafted by the Dischargers' former consultant, refers to the San Francisco Estuary Institute EcoAtlas and shows that most of the Property is wetlands, and prior to the diking, draining, and filling of the Bay's wetlands and waters, the Property was part of San Francisco Bay.*

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Exhibit 1

June 13, 2019: San Francisco Bay Conservation and Development
Commission email to Mr. Dhillon regarding White Slough Specific Area
Plan and Regional Water Board jurisdiction.

From: "Soumoy, Pascale@BCDC" <pascale.soumoy@bcdc.ca.gov>

Date: Thursday, June 13, 2019 at 5:18 PM

To: "dhillonx@yahoo.com" <dhillonx@yahoo.com>

Subject: 4018 Sonoma Blvd and BCDC

Dear Mr. Dhillon,

Regarding our conversations about 4018 Sonoma Blvd. in Vallejo CA – I did some research on the area and feel it is important to note that White Slough directly across the Sonoma Blvd from your property is in our jurisdiction – it is considered a tidal slough tributary to the Napa River also in BCDC jurisdiction as a certain water way.

Chapter 6 of the McAteer-Petris Act discusses the history of White Slough and how it is governed [Blockedhttp://www.bcdc.ca.gov/plans/mcateer_petris.html](http://www.bcdc.ca.gov/plans/mcateer_petris.html) Ch 6 refers to the White Slough Specific Area Plan of Solano Co. as well.

Although it appears that the property is outside of BCDC jurisdiction you may want to contact BCDC should you decide to develop the property to confirm this. Please note that the following agencies may have jurisdiction over your property and you may want to contact them as well – US Army Corps of Engineers, CA Department of Fish and Wildlife, Regional Water Quality Control Board, and the CA State Lands Commission.

Thanks for your call, please feel free to contact us should you have any further questions.

All my best,

Pascale

Pascale Soumoy
Environmental Scientist
Dredging and Sediment Management
San Francisco Bay Conservation and Development Commission
455 Golden Gate Avenue, Suite 10600
San Francisco, CA 94102
(415) 352-3669

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Exhibit 2

October 23, 2020: Vallejo Flood and Stormwater District email to Water Board staff regarding legality of stormwater runoff onto property (answer to Question 3 herein).

From: [Mark Hall](#)
To: [Carlton.Cleet@Waterboards](#)
Cc: [Jennifer.Harrington](#); [Anita.Setty](#); [Mark.Tomko](#); [Justin.Keating](#); [Kyle.Broughton](#); [Natalie.Muradian](#); [Jose.Gutierrez](#); ["Robert.Newman@cityofvallejo.net"](#); [Thompson.Brian@Waterboards](#)
Subject: RE: Stormwater inquiry at Solano County Assessor's Parcel Number 0052-160-090
Date: Friday, October 23, 2020 2:45:27 PM
Attachments: image001.png
Page 6.pdf
Page 26.pdf

EXTERNAL:

Good afternoon Cleet,

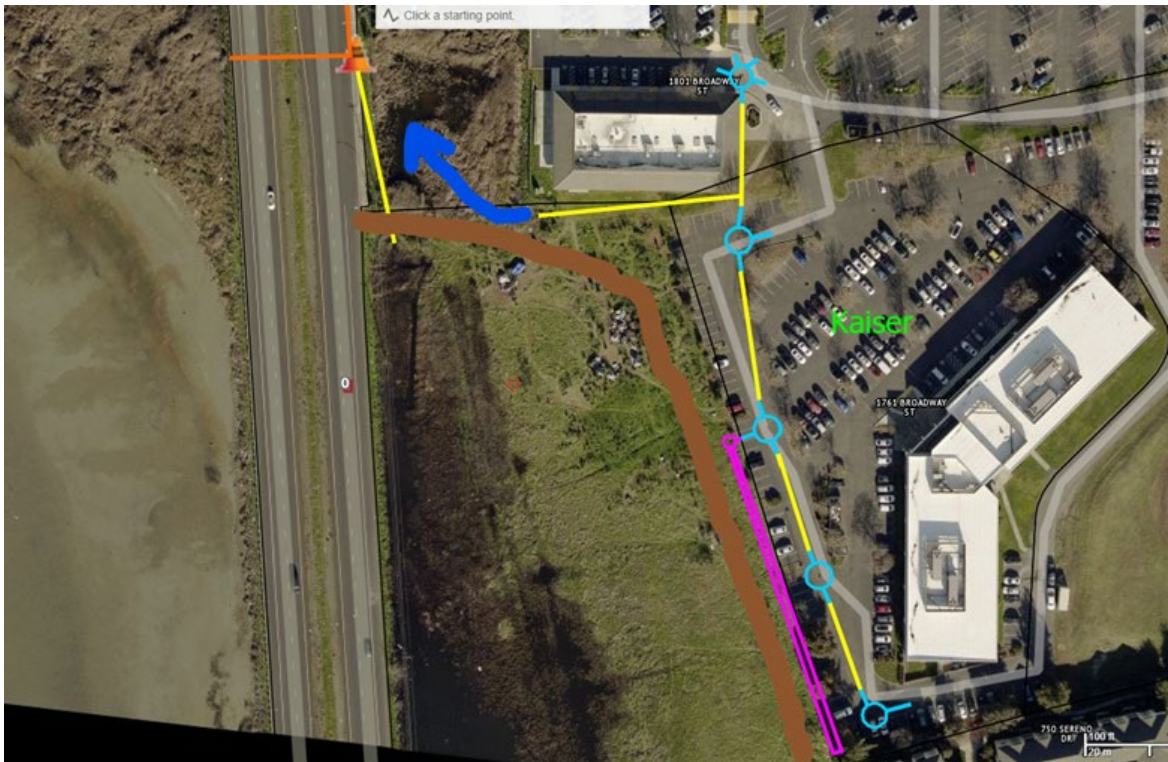
I apologize for the delay in getting back to you. Please find the District's response to your questions below and feel free to contact me if you have any additional questions.

I have a couple questions. In the second image, you note a line draining from the northwest of the property in question to a Caltrans collection box which discharges under the highway to White Slough. Do you know if, during particularly high tides, the flow could reverse and send the slough water back into the property in question? We know the White Slough Flood Control Study documents two or three culverts under the highway connecting the slough with the ponding in the property and am wondering if this could be one of them.

1. We have reviewed the White Slough Flood Control Study as well as other documents relating to White Slough. These documents indicate that the parcel in question is actually considered to be a part of White Slough, described as the East Lagoon (see attached drawings from the 1996 White Slough Specific Area Plan, authored by City of Vallejo and Solano County). The portion of White Slough directly across Highway 29 is referred to as the North Lagoon and the portion bounded by Redwood and Sacramento Streets as the South Lagoon. These documents describe 4 connections between the East and North Lagoons: two 30" lines and two 24" lines. We can confirm two of these exist: the 30" CalTrans culvert near the NW corner of the parcel (which runs under Highway 29 into North Lagoon) and the 24" CalTrans culvert at the SW corner of the parcel (which runs down to Sereno Dr and out to the North Lagoon). We cannot confirm the existence of a 2nd 24" and 2nd 30" line. The documents also describe the potential for tidal action to affect all portions of White Slough, including the East Lagoon. We can confirm that, based on the elevations of the pipes running underneath Highway 29, it is possible that water could flow into the East Lagoon if water levels in North Lagoon were high enough.

Also just to clarify, the magenta line is an open ditch that looks to capture runoff from the Kaiser lot overflow. But it connects back up to the parallel drain line under the parking lot, only to connect to a line that discharges to an outlet with riprap. Is the latter the near east-west yellow line leading back onto the north edge of the property shown on the second and third image? If so it seems odd that drainage meant to capture run-on to the site would be re-routed back onto the site elsewhere.

2. That is correct. Based on the connections observed and construction plans, it appears that the small amount of sheet flow from the western slope of Kaiser's property would be captured by the magenta v-ditch, routed back to the storm drain system in the Kaiser parking lot, join with the storm system from the shopping center to the north and then discharge into the East Lagoon through a shared outfall at the end of the east-west yellow line in my screenshot. Based on field observations, there is a slightly elevated driveway (shown in brown below) starting in the NW corner and running southeast just south of the outfall. It appears that this elevated driveway could act as a levee, preventing the outfall discharge from flowing south and instead directing it NW across the parcel line and to the 30" CalTrans culvert. However, this is speculation about drainage on private parcels and the District cannot confirm this.



With respect to both of these lines leading to drainage onto the property, the last question I have is whether they were legal or otherwise permitted when installed, or if there is any city or county regulation that would currently consider these legal or not. We briefly discussed this, but I believe you wanted to confer with other City entities to get a complete picture. Is this where copying Robert Newman fits in?

3. Based on the fact that the parcel in question is part of White Slough it would have been appropriate to route stormwater flow from neighboring parcels onto it. Additionally, the historical documents we've reviewed describe the East Lagoon as a wetland (see attached). The City of Vallejo's current development plan, the Propel Vallejo General Plan 2040, also places East Lagoon in the "Parks, Recreation and Open Space" category. After conferring with Robert Newman at City of Vallejo, District and City staff are not aware of any regulations that would be used to change the status of existing private stormwater infrastructure that was in place since the 1980s.

Please feel free to contact me if you have any questions.

Best regards,

Mark Hall
Environmental Compliance Supervisor
Vallejo Flood & Wastewater District
(707) 652-7813 office
(707) 654-7096 cell

From: Carlton, Cleet@Waterboards <Cleet.Carlton@waterboards.ca.gov>

Sent: Tuesday, October 20, 2020 11:28 AM

To: Mark Hall <MHall@vallejowastewater.org>

Cc: Jennifer Harrington <JHarrington@vallejowastewater.org>; Robert Newman <robert.newman@cityofvallejo.net>; Jose Gutierrez <JGutierrez@vallejowastewater.org>; Thompson, Brian@Waterboards <Brian.Thompson@waterboards.ca.gov>

Subject: RE: Stormwater inquiry at Solano County Assessor's Parcel Number 0052-160-090

Hi Mark,

It's been a while since this last email and would like to know if you found any additional information on the drain line connections

between the property in question and the slough to the west, along with any information on the permitting or legality of storm drain inlets/outlets on the property. If possible, could we please hear back from you by this Friday?

Thanks,

Cleet Carlton, P.G.
San Francisco Bay Regional Water Quality Control Board

From: Carlton, Cleet@Waterboards <Cleet.Carlton@waterboards.ca.gov>
Sent: Tuesday, June 16, 2020 7:48 AM
To: Mark Hall <MHall@vallejewastewater.org>
Subject: Re: Stormwater inquiry at Solano County Assessor's Parcel Number 0052-160-090

Thanks Mark,

I look forward to hearing back from you.

Cleet

From: Mark Hall <MHall@vallejewastewater.org>
Sent: Monday, June 15, 2020 4:04 PM
To: Carlton, Cleet@Waterboards <Cleet.Carlton@waterboards.ca.gov>
Subject: Re: Stormwater inquiry at Solano County Assessor's Parcel Number 0052-160-090

EXTERNAL:

Good afternoon Cleet,

I haven't forgotten about this! I had to get some additional clarification from our Engineering and Field Operations staff regarding the under-highway connection. I'll be getting back to you shortly.

Thank you,
Mark

On Jun 1, 2020, at 3:36 PM, Carlton, Cleet@Waterboards <Cleet.Carlton@waterboards.ca.gov> wrote:

Hi Mark,

Thanks for this information. I have a couple questions. In the second image, you note a line draining from the northwest of the property in question to a Caltrans collection box which discharges under the highway to White Slough. Do you know if, during particularly high tides, the flow could reverse and send the slough water back into the property in question? We know the White Slough Flood Control Study documents two or three culverts under the highway connecting the slough with the ponding in the property and am wondering if this could be one of them.

Also just to clarify, the magenta line is an open ditch that looks to capture runoff from the Kaiser lot overflow. But it connects back up to the parallel drain line under the parking lot, only to connect to a line that discharges to an outlet with riprap. Is the latter the near east-west yellow line leading back onto the north edge of the property shown on the second and third image? If so it seems odd that drainage meant to capture run-on to the site would be re-routed back onto the site elsewhere.

With respect to both of these lines leading to drainage onto the property, the last question I have is whether they

were legal or otherwise permitted when installed, or if there is any city or county regulation that would currently consider these legal or not. We briefly discussed this, but I believe you wanted to confer with other City entities to get a complete picture. Is this where copying Robert Newman fits in?

Thanks again for your time and look forward to hearing back from you.

Cleet Carlton
San Francisco Bay Regional Water Quality Control Board
(510) 622-2374

From: Mark Hall <MHall@vallejowastewater.org>

Sent: Friday, May 29, 2020 5:23 PM

To: Carlton, Cleet@Waterboards <Cleet.Carlton@waterboards.ca.gov>

Cc: Jennifer Harrington <Harrington@vallejowastewater.org>; Robert Newman <robert.newman@cityofvallejo.net>; Jose Gutierrez <JGutierrez@vallejowastewater.org>

Subject: RE: Stormwater inquiry at Solano County Assessor's Parcel Number 0052-160-090

EXTERNAL:

Good afternoon Cleet,

Here is a summary of information we've gathered regarding parcel APN # 0052160090 here in Vallejo. The catch basin you indicated at the SW corner of the property is a CalTrans drain. Per our GIS, the water it collects flows South to Sereno Dr and then out to the slough, so it does not appear that this drain has any effect on 0052160090.

<image001.png>

On the Eastern edge of the property, the 3 catch basins you indicated are part of Kaiser Permanente's private storm drain system. The following is based on both field observations and plans we have from when the Kaiser building/parking lot were built. The blue circles indicate catch basins and the blue lines indicate the direction the inlets/outlets are facing – all confirmed with field observation. The yellow lines are what is indicated on the plans we have.

It appears that water flows North through Kaiser's private storm drain system into a CB at the NW corner of the property. (Interestingly, we discovered a concrete v-ditch (in magenta) on property 0052160090 with a 6" drop inlet that flows into Kaiser's system. It looks like it's designed to catch any sheet flow from Kaiser's parking lot). From the CB in the NW corner of Kaiser's lot, water flows North, where it joins a 27" line flowing South from the Raley's parking lot. These 2 lines join together, flow East and the plans indicate they discharge through a 30" outfall with rip-rap. Vegetation was too thick for us to confirm. The plans indicate that a second 30" line collects water from the NW corner of 0052160090 and sends it North to another CalTrans CB, which discharges under Hwy 29 into White Slough.

<image003.png>

Another CalTrans catch basin adjacent to Starbucks also flows South into this 30" line going under Hwy 29. The final CB you identified is a private CB in the Starbucks drive-thru. Field observations showed that its outlet pipe faced due south, although the plans indicate it may also tie into the 30" line going under Hwy 29.

<image002.png>

Overall, it appears that large portions of the Raley's parking lot and the Kaiser lot do drain into 0052160090. It should be noted that the black parcel boundaries in these pictures are not exact and are often off by several feet. With the unconfirmed outfall/rip-rap being right near the boundary between parcels and extremely thick vegetation, it is difficult to tell if the water crosses parcel lines or not.

I've cc'd Robert Newman from City of Vallejo on this email. Please feel free to reach out to me or Robert if you have any additional questions.

Best regards,

Mark Hall
Environmental Compliance Supervisor
Vallejo Flood & Wastewater District
(707) 652-7813 *office*
(707) 654-7096 *cell*

From: Carlton, Cleet@Waterboards <Cleet.Carlton@waterboards.ca.gov>
Sent: Thursday, May 28, 2020 4:06 PM
To: Mark Hall <MHall@vallejowastewater.org>
Cc: Thompson, Brian@Waterboards <Brian.Thompson@waterboards.ca.gov>
Subject: Stormwater inquiry at Solano County Assessor's Parcel Number 0052-160-090

Hi Mark,

Thanks for taking my call today and for the update in your search for drainage at and around the property in question. As I mentioned I'd do on the phone, I attached an image showing the drop inlet locations in red I found through Google Maps street view. I realize there may be others, especially around the condos to the east. But if I can get some confirmation on where the water from these DIs goes (particularly if they go to the property in question or elsewhere), that would be a big help. You also mentioned that there may be drain lines from adjacent parcels that might discharge onto the property that may have been approved at the time of construction. Any more information on this too would be helpful.

Thanks for looking into this. If you need to contact me, you can leave a message at 510-622-2374, or (better) email me back. I look forward to hearing from you.

Cleet Carlton
San Francisco Bay Regional Water Quality Control Board